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August 15, 2017

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Via ECF:
State of New York Office of the Attorney General
120 Broadway, 26th Floor
New York, NY 10271-0332
Attn: Rebecca Fromer, Esq., Assistant Attorney General

All remaining Counsel of record and parties in this matter (see service rider)

RE: Seggos v. Datre et al.
Case No. 2:17-cv-02684

Dear Ms. Fromer and Counselors:

Our office represents Defendant New Empire Builder Corp. in the above referenced matter. Enclosed please find our Motion to Dismiss, specifically for an Order dismissing this action against New Empire Builder Corp. pursuant to Fed. R. Civ. P. 12(c) for judgment on the pleadings for the failure to state a cause of action and further granting Defendant New Empire Builder Corp. such other further and/or different relief as this Court deems just and proper. This includes our Notice of Motion, Declaration, Exhibits and Memorandum of Law.

Pursuant to the Individual Rules of Hon. Sandra J. Feuerstein, U.S.D.J., opposition papers, if any, are due within fourteen (14) days of service of these moving papers. If opposition papers cannot be prepared within this fourteen day period, we may agree to a later due date, informing the Court in writing of the consensual briefing schedule. Moreover, only a copy of your cover letter shall be filed. We will have seven (7) days to serve our reply, absent agreement for more time. As the moving party, we will file all papers via ECF following the Court's "Bundle Rule".

Very truly yours,


Paul J. Felicione, Esq.

PJF/amc

SERVICE RIDER

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